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MEETING OF THE

TRANSPORTATION CONFORMITY WORKING GROUP COMMITTEE

Tuesday, August 23, 2005

10:00 a.m. – 12:00 p.m.

SCAG Offices
818 W. 7th Street, 12th Floor
Riverside A Conference Room
Los Angeles, California 90017
213.236.1800

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Ted Harris at 213.236.1916 or harrist@scag.ca.gov

SCAG, in accordance with the Americans with Disabilities Act (ADA), will accommodate persons who require a modification of accommodation in order to participate in this meeting. If you require such assistance, please contact SCAG at (213) 236-1868 at least 72 hours in advance of the meeting to enable SCAG to make reasonable arrangements. To request documents related to this document in an alternative format, please contact (213) 236-1868.

TRANSPORTATION CONFORMITY WORKING GROUP
INTERAGENCY CONSULTATION
AGENDA

			PAGE #	*TIME*
1.0	**CALL TO ORDER**	**Douglas Kim, LAMTA**		
2.0	**WELCOME AND INTRODUCTION**	**Douglas Kim, LAMTA**		
3.0	**PUBLIC COMMENT PERIOD** **Members of the public desiring to speak on an agenda item or items not on the agenda, but within the purview of this committee, must fill out a speaker's card prior to speaking and submit it to the Staff Assistant. A speaker's card must be turned in before the meeting is called to order. Comments will be limited to three minutes.**			
4.0	**CHAIR'S REPORT**	**Douglas Kim, LAMTA**		
5.0	**ACTION ITEMS**			
5.1	Approval of the July 26, 2005 Meeting Summary **Attachment**	**Douglas Kim, LAMTA**	**1**	
6.0	**INFORMATION ITEMS**			
6.1	2006 RTIP Guidelines **Attachment**	**Rosemary Ayala, SCAG**	**6**	20 minutes
6.2	2007 RTP Update	**Naresh Amatya, SCAG**		10 minutes
6.3	Reauthorization Update **Attachment**	**Grace Balmir/ Jean Mazur, FHWA**	**7**	10 minutes
6.4	PM 2.5 Inventories Guidance **Attachment**	**EPA Staff**	**11**	10 minutes

TRANSPORTATION CONFORMITY WORKING GROUP
INTERAGENCY CONSULTATION
AGENDA

			PAGE #	TIME
6.0	**INFORMATION ITEMS CONT/D**			
6.5	2007 AQMP Update	**Eyvonne Sells, SCAQMD**		5 minutes
6.6	PM2.5 Conformity Process **Attachment**	**Ted Harris, SCAG**	**28**	10 minutes
6.7	TCM Update	**Ted Harris SCAG**		5 minutes
6.8	Information Sharing	**Group Discussion**		
7.0	**ADJOURNMENT**	**Douglas Kim, LAMTA**		

The next Statewide Transportation Conformity Working Group will be held on Thursday, September 22, 2005 at SCAG offices.

Please provide 30 copies of materials you would like to distribute at the meeting. If you have any questions, please contact Ted Harris at (213) 236-1916 or harrist@scag.ca.gov.

Conference call information will be sent by Cathy Alvarado, (213) 236-1896 or e-mail alvarado@scag.ca.gov**.**

Transportation Conformity Working Group
Interagency Consultation
Meeting Summary

Tuesday, July 26, 2005
10:00 AM – 12:00 PM

Southern California Association of Governments
818 W 7th Street, 12th Floor
Los Angeles, CA 90017
Riverside 'A' Conference Room

The Transportation Conformity Working Group (TCWG) held its monthly meeting on Tuesday, July 26, 2005 at SCAG's downtown offices. The following minutes are intended to summarize the matters discussed. An audio recording of the entire meeting is available for review at SCAG's office.

1.0 CALL TO ORDER

The meeting was called to order at about 10:07 AM by Ted Harris, Association Regional Planner, SCAG Staff.

2.0 WELCOME AND SELF-INTRODUCTIONS

ATTENDANCE:

In Person:
Joe Alcock, SCAG
Augustus Ajawara, RTA
Naresh Amatya, SCAG
Rosemary Ayala, SCAG
Grace Balmir, FHWA/FTA
Jennifer Brost, SCAG
Meenu Chandan, Caltrans
Herman Cheng, MTA
Jose Gutierrez, City of L.A., EAD
Ted Harris, SCAG
Kathryn Higgins, SCAQMD
Ben Ku, MTA
Philip Law, SCAG
Betty Mann, SCAG
Nancy Marroqum, MTA
Jean Mazur, FHWA
Shirley Medina, RCTC
Laleh Modrek, Caltrans
Sylvia Patsaouras, SCAG
Eyvonne Sells, AQMD
Arnie Sherwood, ITS/UCB
Paul Taylor, OCTA
Teresa Wang, SCAG
Carla Walecka, TCA
Leann Williams, Caltrans
Andy Woods, Caltrans District
Sean Yeung, Caltrans

Via Teleconference:

Jennifer Bergener, OCTA
Mike Brady, Caltrans Headquarter
Ben Cacatian, Ventura County
Matt Dessert, Imperial County APCD
Paul Fagan, Caltrans District 8
Sandy Johnson, Caltrans District 11

2.0 PUBLIC COMMENT PERIOD

There were no public comments at this meeting.

4.0 CHAIR'S REPORT

There was no report at this time.

5.0 ACTION ITEMS

5.1 Approval of the April 26, 2005 Meeting Summary

It was noted that on 6.4, Toby Tiktinsky's last name was spelled incorrectly.

Additionally, it was pointed out that item 6.3, last paragraph, third sentence needed to be corrected and read – If you do a TIP amendment and do conformity on it, the projects also included in the RTP. On item 6.5 the subject title should be corrected to read 2007 AQMP Update and corrected throughout the summary. The second paragraph needs to be corrected to reflect that the final hearing will be by the AQMD Governing Board in February of 2007.

Motion was made to approve the minutes and unanimously approved.

6.0 INFORMATION ITEMS

6.1 RTIP Update (Rosemary Ayala, SCAG)

Rosemary Ayala, SCAG, presented an update on the RTIP, reporting that currently the major focus of the RTIP staff is the development of the 2006 RTIP guidelines. This is what SCAG provides to the Commissions and Imperial County for their Federal TIP submittals for the 2006 Federal TIP. Staff is currently tabbing the document by putting everything in sections, i.e. all policy and requirements in one section, conformity, clarification of TCM processes, etc. FHWA is providing appropriate language and process for the NEPA approval. Staff has the working draft schedule, which the County TIP's will be due to SCAG in mid-December.

An amendment is due from the County Transportation Commissions and Imperial County on Thursday, July 28. Amendment #9 is pending State and Federal approval.

Given the delay of the STIP, the adoption of the fund estimate will be delayed until October and there will be an associated two-month delay for the RTIP's to the State. Because of this delay, CTC approval is anticipated for June 2006.

Grace Balmir, FTA/FHWA, commented that she hoped this document would help the different county commissioner's and the local entities understand what needs to be included in the RTIP. Because this year we have been averaging one TIP amendment every month, and

they are large amendments. She would like to see that the projects that are going to move forward are included in the TIP and that we do not wait until the last minute to amend them to put them in the document. Ms. Ayala responded that this was correct that we have had an amendment almost every month and that is why staff is reverting back to quarterly amendments. This year we did not know what the State budget was going to bring and whether there would be a potential lock down. Consequently, the Region was trying to make changes it needed, and that is why we did not hold to a quarterly amendment process.

6.2 RTP Update (Naresh Amatya, SCAG)

Naresh Amatya, SCAG, presented an update on the 2007 RTP. Mr. Amatya stated that a key question on some of the committee's members minds is are we still on a compressed schedule, or a regular tri-annual scheduled. Although a final decision has not been made at this point staff is working towards the tri-annual schedule. The initial reasons for considering an earlier update are resolving in a way that may not require a compressed schedule. Staying on the tri-annual schedule will be a challenge in itself from this point on given a number of issues that have to be worked through. There are many things happening in the Goods Movement and Corridor studies arena. In the Corridor studies we are coming to a conclusion on I-710 corridor study and work on I-15 work is continuing. In the area of Goods Movement, the Statewide Initiative needs to be integrated into the RTP update is a big challenge. Staff is developing a more detailed work plan to accomplish what needs to be done. Staff is reviewing the baseline growth and revenue forecast, and some of the other key planning assumptions.

SCAG is refining the model for the next plan update. Additionally, over the next few months, staff is going to be reviewing the inventory of projects and getting feedback from all the stakeholders to make sure that our inventory of projects, which is going to be the basis for developing alternatives, is updated with the most current information.

Staff is close to the point of getting a consultant team onboard to assist us with the update process. The team, System Metics Group, is the consultant's that helped us update our last RTP. In the next update there are several challenges that need to be resolved, primarily in the Goods Movement and Finance Area.

Plans are expected to be collected from all the Counties in February or March of next year. The model validation is going to be ready around December or January time frame, and a lot of the analytical work will not be able to be done before that time.

6.3 Centerline Update (Paul Taylor, OCTA)

Ted Harris, SCAG, introduced Paul Taylor of OCTA and reviewed the TCMs process in the South Coast. Mr. Harris mentioned that if it turns out there is a need for a replacement, the process would likely be a similar to the previous scope change for the Centerline project. The first step is to evaluate alternatives to see if other projects in Orange County would give the same emission reductions, in the same air basin, completed by the same completion date. OCTA would come forward with this information to the TCWG. We will then discuss it through interagency consultation and evaluate the information presented. Once it meets all the criteria mentioned, then it will come back as a formal RTIP amendment and, if needed, an RTP amendment, although an RTP amendment would be less preferable.

Paul Taylor, OCTA, reported that federal funding has not been forthcoming as anticipated in the RTIP and RTP and is delayed to the point of compromising the delivery schedule of this project by 2010. Consequently, OCTA is taking proactive measures to study all replacement projects for the Centerline to give our OCTA's Board of Directors the ability to decide what they want to do. OCTA staff can then give the Board projects that can be delivered on time with funds OCTA can control. However, until the Board acts to terminate the Centerline

project and requests the process to amend a replacement into to the RTIP, Centerline remains a part of the RTP and RTIP.

The Board has considered thirty-four options after pausing CenterLine in February 2005. The thirty-four options analyzed, include: current project, other light rail transit, bus rapid transit, commuter rail, gateways to regional connections, other transit projects, and road projects. OCTA's Transit Planning and Operations Committee has had six work sessions since February of this year. All options were evaluated with focus on six 'sample packages' with emphasis on: costs, benefits, feasibility by 2010 and percent of contribution to emissions reduction with the current project defined as 100%. The considerations that are being used in evaluating the options are: readiness and the opening date, efficient use of resources, potential funding, Measure M considerations, transportation benefits, and regional issues. The Board itself has had two discussions on the options and it is expected that they will be making decisions on which of these options they'd like to pursue in the next two months. Once this comes about, the Air District and EPA will become involved in this process.

6.4 2007 AQMP Update (Karhryn Higgins, SCAQMD)

Kathryn Higgins, SCAQMD, stated that the planning staff is still in the process of finalizing the baseline emissions inventories. As soon as ARB finalizes the revisions to EMFAC 2005, we can get underway with the AQMP process. The draft is expected to be released next summer and the final in February 2007.

6.5 Interim Guidance on Fiscal Constraint (Jean Mazur, FHWA)

Jean Mazur, FHWA, gave a briefing on the FHWA's new financial constraint guidance, which was released at the end of June. We are currently working on preparing a letter to Caltrans and copying the MPO's about what we believe the effects of this guidance is going to have in California. Additionally, we have arranged with Caltrans to talk about the guidance at the next CFPG meeting. A task force is being set up to address some of the financial constraint guidance.

The guidance consists of the statutory and regulatory references, it includes some financial constraint definitions, there is a series of frequently asked questions and there are some sample worksheets. In general it is consistent with practices in California. For example FHWA and FTA cannot act on new amended TIP's and STIP's or plans unless they reflect changed revenue situations. For plans that are based on outdated or invalid costs estimates for projects or operations and maintenance, FHWA cannot approve amendments or new TIPs or RTPs. Document financial forecast approaches, assumptions, and results in TIPs and RTPs.

There are three areas that we think we need to improve upon in California: 1) properly reflecting advanced construction and their conversion to federal aid funding in TIPs and STIPs, 2) a better reflection of operating and maintenance costs, and to be, 3) cost estimates for projects and how over time those cost change and how it is reflected in the planning process as the costs change. We anticipate these improvements would be made over time with the next FSTIP.

Reauthorization Update (Jean Mazur, FHWA)

There was nothing to report at this time.

6.7 PM 2.5 Guidance (Dave Jesson, EPA)

Jean Mazur, FHWA, reported that it was her understanding that the guidance was currently going through the official EPA signature chain.

6.8 PM 2.5 Conformity Process (Ted Harris, SCAG)

Ted Harris, SCAG, stated that staff expected that the PM 2.5 Conformity process would be similar to the 8-HR Ozone process that we went through last year. We need to have a Conformity termination by April 5, 2006 to avoid a conformity lapse. We expect to come back to this group with a memo for the proposed process next month, and then take it to the Energy and Environment Committee. There is training on September 15 in Sacramento. Corrections will be made as needed based on the training. We hope to get an approval by the Regional Council for the authored resolution in February 2006, and then send it to FHWA to review and approve.

6.9 Information Sharing (Group Discussion)

Ted Harris, SCAG, announced that Mike Ganor, SCAG's TCM contact was no longer with the agency. Mr.Harris requested that all e-mails regarding TCM lists be sent directly to him, harrist@scag.ca.gov.

Jean Mazur, FHWA, stated that she wished to emphasize that the PM 2.5, Annual and Daily Standards, Guidance addressed how to do the emissions inventory and conformity for the annual standard. She also said that Southern California and the San Joaquin Valley are the only regions in California that violate the PM 2.5 standards.

7.0 ADJOURNMENT

The meeting adjourned at approximately 11:37 Noon. The next meeting of the TCWG will be Tuesday, August 23, 2005 at the SCAG offices.

DATE: August 23, 2005

TO: Transportation Conformity Working Group

FROM: Rosemary Ayala, Lead Regional Planner
(213/236-1927; FAX 213/236-1963; ayala@scag.ca.gov)

SUBJECT: 2006 Regional Transportation Improvement Program (2006 RTIP) Guidelines

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SUMMARY:
The 2006 Regional Transportation Improvement Program Guidelines are prepared in concert with the transportation commissions and the Imperial Valley Association of Governments (IVAG). The purpose of the guidelines is to facilitate the work of the commissions and IVAG, Caltrans, and transit operators in the development of the RTIP project listing and in the submittal of the county TIPs to SCAG.

The main intent is to ensure the project listing fulfills the legal, administrative, and technical aspects of the RTIP process, and to minimize duplicate efforts by the various agencies involved in the process.

BACKGROUND:
SCAG is required under both federal and state laws to develop a Regional Transportation Improvement Program. The RTIP is the short-range program that implements the long-range Regional Transportation Plan (RTP) to accomplish improvements in mobility and air quality.

SCAG develops the RTIP in cooperation with the State (Caltrans), the county transportation commissions and IVAG, and public transit operators. Federal law requires that the RTIP be updated at least every two years, adopted by SCAG, and sent to the Governor for approval. The RTIP Guidelines are updated every two years by SCAG staff working with the staff from the transportation commissions/IVAG to ensure that all current legal, administrative, and technical requirements are met.

In addition, these Guidelines assume continuation of all major federal programs currently found in TEA-21 in the 2006 RTIP period. The Guidelines will be modified if programs are modified, added and/or deleted to be consistent with the federal transportation act.

The draft 2006 RTIP Guidelines are posted on SCAG's webpage. SCAG welcomes comments from the Southern California Transportation Conformity Working Group, especially constructive comments focusing on the Conformity and TCM sections.

Selected Conformity Provisions in the Reauthorization of the Transportation Equity Act
Updated August 1, 2005

Provision:	Current Program	Administration Proposal	Senate SAFETEA Bill	House TEA-LU Bill	SAFETEA-LU
Frequency: When is conformity required?	–Before new transportation plans and TIPs are adopted or updated (CAA)	Same as current program, but: --Plans and TIPs would be combined into one document that serves both functions	Same as current program	Same as current program	Same as current program **[Section 6011(b)]**
	– Plans must be updated every 3 years (DOT reg.) – TIPs must be updated every 2 years (TEA-21)	– Plans would be updated every 5 years (TIPs would no longer exist)	– Plans would be updated every 4 years – TIPs would be updated every 4 years	– Plans would be updated every 4 years – TIPs would be updated every 4 years	– Plans would be updated every 4 years – TIPs would be updated every 4 years **[Section 6001(a)]**
	– At least every 3 years (CAA)	– Every 5 years	– Every 4 years	– Every 4 years	– Every 4 years **[Section 6011(b)]**
	– Within 18 months of a new SIP budget (conformity regulation)	– Same as current program (regulation would continue to require conformity within 18 months of a new budget)	– Within 2 years of a new SIP budget	– Within 2 years of a new SIP budget	– Within 2 years of a new SIP budget **[Section 6011(a)]**
Horizon: What period of time does each conformity determ. analyze?	The entire length of the transportation plan; transportation plans cover at least a 20 year period.	The longest of the following: – the first 10 years of the transportation plan – the latest year for which a SIP establishes a budget – the completion date of a regionally significant project that requires approval prior to the subsequent conformity	The longest of the following: – the first 10 years of the transportation plan – the latest year for which a SIP establishes a budget – one year after the completion date of a regionally significant	– The entire length of the transportation plan, OR – At the election of the MPO and air agency, the longest of the following: – the first 10 years of the transportation plan – the attainment date set forth in the SIP	– The entire length of the transportation plan, OR – At the election of the MPO after consultation with the state air agency and after a public comment period, the longest of the following: – the first 10 years of the transportation plan – the latest year for

Provision:	Current Program	Administration Proposal	Senate SAFETEA Bill	House TEA-LU Bill	SAFETEA-LU
		determination	project, if the project requires approval before the subsequent conformity determination. Except maintenance areas with adequate or approved emissions budgets for the second ten-year maintenance period where the analysis would only extend through the end of the second maintenance period.	– the year after the completion date of a regionally significant project, if the project will be programmed in the transportation improvement program (TIP) or requires approval before the subsequent conformity determination. Except, at the election of the MPO and air agency, maintenance areas with adequate or approved emissions budgets for the second ten-year maintenance period where the analysis would only extend through the end of the second maintenance period	which a SIP establishes a budget – the year after the completion date of a regionally significant project, if the project is included in the transportation improvement program (TIP) or requires approval before the subsequent conformity determination. **[Section 6011(c)]** Except, at the election of the MPO after consultation with the state air agency and after a public comment period, maintenance areas with adequate or approved emissions budgets for the second ten-year maintenance period where the analysis would only extend through the end of the second maintenance period **[Section 6011(c)]**
		An FYI-only analysis must be done for the last year of the transportation plan, if such a year extends beyond the above timeframe	No provision for FYI analysis	An FYI analysis would be required for any years of the plan that extend beyond the above period.	An FYI-only analysis must be done for the last year of the transportation plan, if such a year extends beyond the above timeframe and for

Provision:	Current Program	Administration Proposal	Senate SAFETEA Bill	House TEA-LU Bill	SAFETEA-LU
					any year shown to exceed emissions budgets by a prior informational regional emissions analysis if such year extends beyond the applicable period covered by the conformity determination. **[Section 6011(c)]**
What projects can proceed during a lapse?	Only the following: – Exempt projects – TCMs in approved SIPs – Any project phase that received approval or funding prior to the lapse	No change offered	Projects that proceed under the current program, plus: – All federal projects that are not "regionally significant" as defined in the bill*	– For a period of 1 year, there are no consequences of a lapse, so any project in the TIP can proceed – After 1 year, only projects that proceed under the current program	– For a period of 1 year, there are no consequences of a lapse, so any project in the TIP can proceed – After 1 year, only projects that proceed under the current program **[Section 6011(e)]**
Before SIP budgets are available, how do areas determine conformity?	Using one of the following: – baseline year test (emissions from the planned transportation activities compared to emissions in the baseline year) – build/no-build test (emissions compared to the "no-build" case), or	No provision suggested for bill**	Would allow areas to use: – existing SIP budgets, or – the current program tests	No provision	No provision in the final bill.

Provision:	Current Program	Administration Proposal	Senate SAFETEA Bill	House TEA-LU Bill	SAFETEA-LU
	– both				
Which provisions of the conformity rule must be included in an area's Conformity SIP?	Conformity SIPs must include the entire conformity regulation and local consultation criteria and procedures.	Conformity SIPs would be required to include local consultation criteria and procedures only. New or revised conformity SIPs would be due within 24 months after enactment.	Conformity SIPs would be required to include local consultation criteria and procedures only. EPA would be required to revise the conformity rule to address this provision within 24 months after enactment.	No provision included in the bill.	Conformity SIPs would be required to include local consultation criteria and procedures and provisions related to enforcement and enforceability of commitments to emission reductions or mitigation measures. **[Section 6011(f)]** EPA required to revise the conformity rule within 24 months of enactment to address the conformity-related changes. **[Section 6011(g)]**
What requirements must be met in order to replace TCMs in an approved SIP?	Areas must either go through the SIP revision process to remove a currently approved TCM and replace it with a new TCM or revise the SIP to include a TCM substitution mechanism that establishes a streamlined process for removing and replacing TCMs.***	No provision included in the bill.	Areas would be allowed to make TCM substitutions without the need to revise the SIP to include a TCM substitution mechanism. The bill establishes criteria and procedures for TCM substitutions. (Note: There are slight differences between the House and Senate bills.)	Areas would be allowed to make TCM substitutions without the need to revise the SIP to include a TCM substitution mechanism. The bill establishes criteria and procedures for TCM substitutions. (Note: There are slight differences between the House and Senate bills.)	Areas would be allowed to make TCM substitutions without the need to revise the SIP to include a TCM substitution mechanism. The bill establishes criteria and procedures for TCM substitutions. **[Section 6011(d)]**

EPA
United States
Environmental Protection
Agency

Office of Transportation
and Air Quality

EPA420-B-05-008
August 2005

Guidance for Creating Annual On-Road Mobile Source Emission Inventories for PM2.5 Nonattainment Areas for Use in SIPs and Conformity

EPA420-B-05-008
August 2005

Guidance for Creating Annual On-Road Mobile Source Emission Inventories for PM2.5 Nonattainment Areas for Use in SIPs and Conformity

Transportation & Regional Programs Division
Office of Transportation and Air Quality
U.S. Environmental Protection Agency

Background Information

The purpose of this document is to provide areas that are nonattainment or maintenance for the annual $PM_{2.5}$ national ambient air quality standard ("standard") with guidance on developing annual $PM_{2.5}$ on-road motor vehicle emissions estimates to meet state air quality implementation plan (SIP) and transportation conformity requirements.

For previous and existing air quality standards (e.g., 1-hour ozone, 8-hour ozone, PM10 and carbon monoxide (CO)), areas typically have been required to examine a typical summer or winter day because areas were violating a standard established for a time period of 24 hours or less. As a result, these areas have developed on-road motor vehicle SIP inventories, motor vehicle emissions budgets ("budgets"), and regional emissions analyses[1] for transportation conformity determinations using modeling inputs and parameters that were specific to a typical day within a particular season. However, all areas currently designated nonattainment for $PM_{2.5}$ are violating the annual standard for this pollutant. In order to be consistent with this standard, these areas must develop annual emission inventories for the purpose of developing SIP budgets and demonstrating transportation conformity. This guidance provides information on how areas should fulfill these requirements.

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[1]The process for generating on-road motor vehicle emissions estimates for conformity purposes is commonly referred to as a "regional emissions analysis" in conformity documents. However this term could be confused with the process of creating an inventory for a SIP. To avoid that confusion, we will refer to a "regional emissions analysis" for transportation conformity as a "regional conformity analysis" in this document.

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1. Q. What effect does this guidance have on ozone, CO, and PM10 SIPs and regional conformity analyses?

A. This guidance applies to SIPs and regional conformity analyses for $PM_{2.5}$ nonattainment and maintenance areas that need to develop annual $PM_{2.5}$ inventories, such as areas that are violating the annual $PM_{2.5}$ standard. Ozone, CO, and PM10 SIPs and regional conformity analyses should continue to be based on inventories for a typical summer day or winter day, as applicable, using appropriate MOBILE6.2 input conditions and vehicle miles traveled (VMT). Areas that need to develop inventories for the 24-hour $PM_{2.5}$ standard should follow existing guidance for creating daily emission inventories.

2. Q. What are on-road motor vehicle emission inventories, budgets and regional conformity analyses?

A. An on-road motor vehicle emission inventory represents the total amount of emissions of a particular pollutant or precursor that is emitted by cars, trucks, buses, and motorcycles in a given area for a given point in time. The emissions reductions from on-road motor vehicle control measures are also accounted for in the SIP inventory. When developing an attainment demonstration, reasonable further progress (RFP) plan, or maintenance plan, areas are required to develop emission inventories for all source categories (e.g., point, area, on-road motor vehicle and off-road sources) for specific years. For some of these years, the on-road motor vehicle emission inventory may also serve as the SIP budget that is used to demonstrate transportation conformity. A budget provides a limit or ceiling on the amount of emissions transportation sources can produce in a given area that is consistent with attainment, RFP or maintenance.

The transportation conformity rule (40 CFR parts 51 and 93), requires areas to demonstrate that projected emissions from the planned transportation system do not exceed the budgets established in the applicable SIP. Prior to an adequate or approved SIP budget, 40 CFR 93.109(i)(2) and 93.119(e) provide interim emissions tests that also require a regional conformity analysis. For $PM_{2.5}$ areas that need to do conformity for the annual $PM_{2.5}$ standard, regional conformity analyses should also represent total annual emissions for given years as required by 40 CFR 93.118 and 93.119.

In simplest terms, emissions estimates are created by multiplying emissions factors for a given pollutant or precursor by the total number of vehicle miles traveled (VMT) in a given area for a given year. This document provides guidance on how annual emissions estimates should be developed for inventories, budgets, and regional conformity analyses for SIPs and conformity purposes.

3. Q. What pollutants and precursors are covered by this guidance?

A. This guidance is applicable to the estimation of annual SIP and conformity inventories of direct $PM_{2.5}$ from motor vehicle tailpipe emissions, emissions from motor vehicle brake and tire wear, and re-entrained road dust and construction dust from highway or transit projects. This guidance would also apply, as applicable, to the estimation of annual inventories of applicable $PM_{2.5}$ precursors, i.e., volatile organic compounds (VOCs), nitrogen oxides (NOx), sulfur oxides (SOx), and ammonia. EPA's future $PM_{2.5}$ implementation rule will address when SIP inventories and budgets are established for $PM_{2.5}$ precursors. Requirements for inclusion of precursors in transportation conformity analyses are addressed in a May 6, 2005, final rule (70 FR 24280) and are specified at 40 CFR 93.102(b)(iv)-(v) and 93.119 (f)(9)-(10).

Consistent with the May 6, 2005, final rule, if on-road motor vehicle emissions of one or more $PM_{2.5}$ precursors are determined through the SIP development process to be significant contributors to an area's $PM_{2.5}$ nonattainment problem, an emissions budget for each significant precursor must be established in the SIP. Alternatively, a $PM_{2.5}$ SIP would not establish a motor vehicle emissions budget for precursors that are determined to be insignificant through the SIP development process, and regional emissions analyses for insignificant precursors would not be required for subsequent conformity determinations. See the May 6, 2005, final rule for more information on the requirements for addressing $PM_{2.5}$ precursors in transportation conformity.

$PM_{2.5}$ areas must also address re-entrained road dust in their conformity analyses, if a SIP establishes an adequate or approved $PM_{2.5}$ budget that includes re-entrained road dust. Prior to adequate or approved budgets, areas must include road dust in conformity analyses only if EPA or the State air agency finds road dust to be significant. Requirements for inclusion of road dust in transportation conformity analyses can be found at 40 CFR 93.102(b)(3) and 93.119(f)(8).

Construction-related fugitive dust is not required to be included in any $PM_{2.5}$ conformity determinations before a SIP is submitted. As described in the conformity rule (40 CFR 93.122(f)), construction dust is not required to be considered in the conformity process unless the $PM_{2.5}$ SIP identifies it as a significant contributor to the nonattainment area's $PM_{2.5}$ problem. Areas that are contemplating making this type of determination need to include specific information in their SIPs in order to facilitate future conformity determinations. The inventories should clearly identify how much of the regional construction dust is attributable to highway and transit construction, as opposed to other construction activities. If the SIP is to identify construction dust emissions as a significant contributor, the highway and transit construction dust emissions need to be included and identified as such in the direct $PM_{2.5}$ on-road motor vehicle emissions budget. In addition, the regional conformity analysis would account for the level of construction activity, the

fugitive $PM_{2.5}$ control measures in the SIP (if there are any), and the dust producing capacity of the proposed construction activities (November 5, 2003, 68 FR 62711).

4. Q. Does this guidance create new requirements?

A. No, this guidance is based on the existing Clean Air Act (CAA) and associated regulations and does not create any new requirements. It merely explains how to fulfill current SIP and conformity requirements for developing $PM_{2.5}$ emission inventories and budgets.

The statutory provisions and EPA regulations described in this document contain legally binding requirements. This document is not a substitute for those provisions or regulations, nor is it a regulation itself. Thus, it does not impose legally binding requirements on EPA, states, or the regulated community, and may not apply to a particular situation based upon the circumstances. EPA retains the discretion to adopt approaches on a case-by-case basis that may differ from this guidance, but still comply with the statute and SIP and conformity regulations. Any decisions regarding a particular SIP and conformity determination will be made based on the statute and regulations. This guidance may be revised periodically without public notice.

5. Q. What emissions models should be used to develop SIP inventories and regional conformity analyses for direct $PM_{2.5}$ and $PM_{2.5}$ precursors?

A. For states other than California[2], MOBILE6.2 is currently EPA's approved emission factor model for estimating direct $PM_{2.5}$ emissions from on-road vehicle exhaust and brake and tire wear, and for $PM_{2.5}$ precursor emissions from vehicle exhaust and evaporative emissions. For all states, including California, the methods for estimating re-entrained road dust emissions from cars, trucks, buses, and motorcycles on paved and unpaved roads are incorporated in Chapter 13 of AP-42. These are EPA's approved methods for estimating road dust emissions. However, alternative methods may be used if such methods are approved by EPA and announced in the Federal Register. The use of MOBILE6.2 and AP-42, including discussion of alternatives to AP-42, in SIPs and

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[2]State and local agencies developing SIPs and conformity analyses for California should consult with EPA Region 9 for information on the current version of EMFAC approved for use in California and for information of how to create annual inventories using EMFAC. However, the general concepts in this document for accounting for variation during the year should be followed when creating annual inventories with EMFAC for the $PM_{2.5}$ annual standard.

transportation conformity analyses is described in detail in a separate guidance document.[3]

Chapter 13 of AP-42 includes information on the variability of re-entrained road dust emissions based on environmental conditions, including factors that vary based on time of year. The AP-42 method can be used as described in Chapter 13 to develop annual re-entrained road dust inventories. EPA plans on issuing separate guidance on how to apply adjustments to estimated road dust emissions to reflect the true impact of re-entrained road dust on regional air quality in SIPs and regional conformity analyses. The remainder of this document addresses the use of MOBILE6.2 to calculate annual inventories for direct $PM_{2.5}$ emissions from vehicle exhaust and brake and tire wear, and for applicable $PM_{2.5}$ precursor emissions from vehicle exhaust and evaporative emissions.

EPA has made available the National Mobile Inventory Model (NMIM), which incorporates MOBILE6.2 as well as a database of local activity information and a post-processing system that can produce annual emission inventories. NMIM is an additional tool that can be used for inventory development, although its use is not required. Question 13 of this document discusses the option to use NMIM in SIP development and regional conformity analyses.

6. Q. What issues should state and local air quality agencies and transportation agencies consider when creating annual emissions inventories with MOBILE6.2 for SIPs and regional conformity analyses?

A. State and local agencies need to consider whether MOBILE6.2 inputs or VMT vary during the year enough to affect $PM_{2.5}$ annual emissions estimates. MOBILE6.2 is designed to allow users to estimate motor vehicle emissions based on specific input conditions that include month of evaluation (i.e., January or July), environmental factors (e.g., temperature, humidity), fleet characteristics (e.g., age distribution of fleet, distribution of VMT by vehicle class), activity measures (e.g., speed distributions, distribution of VMT by roadway type), and fuel characteristics (e.g., gasoline RVP, sulfur content). Some of these input conditions will vary based on time of year. For some pollutants, these seasonal variations for certain input conditions will result in different emissions estimates (these variations are discussed in more detail in Question 8). In addition to the input conditions that affect MOBILE6.2 emission factors, VMT may also vary by time of year. These differences in emission factors and VMT by time of year need to be considered in the development of annual inventories.

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[3]"Policy Guidance on the Use of MOBILE6.2 and the December 2003 AP-42 Method for Re-Entrained Road Dust for SIP Development and Transportation Conformity", memorandum from Margo Oge and Steve Page to EPA Regional Air Division Directors, February 24, 2004, which can be found at: www.epa.gov/otaq/models/mobile6/mobil6.2_letter.pdf .

The key question in the development of annual $PM_{2.5}$ emissions estimates for SIPs and conformity is how much temporal disaggregation of input data is needed to produce annual emissions inventories that properly reflect local conditions. If, as a result of local conditions, MOBILE6.2 emissions factors vary significantly over the course of the year, state air quality agencies and transportation agencies may need to do multiple MOBILE6.2 runs with different input conditions to properly develop SIP inventories and regional conformity analyses. State and local air quality and transportation agencies should work together with EPA and the U.S. Department of Transportation, via the interagency consultation process, to determine the appropriate inputs and number of MOBILE6.2 runs needed to produce accurate annual inventories in a given nonattainment or maintenance area. During the interagency consultation process, air quality and transportation agencies should take into account the needs and capabilities of the air quality modeling tools that will be used to develop the SIP, the availability of seasonal or monthly VMT and MOBILE6.2 input data, and the seasonal or monthly variability of that data. Depending on the variability of input conditions and the effect that variability has on emissions, state and local air quality and transportation agencies in consultation with EPA and DOT may determine for some areas that a single set of MOBILE6.2 runs is appropriate, or alternatively, that multiple sets of runs using seasonal or monthly conditions are necessary.

7. Q. What options do areas have to develop annual $PM_{2.5}$ and $PM_{2.5}$ precursor SIP inventories and regional conformity analyses with MOBILE6.2?

A. Depending on variability in local input conditions and on the impact of that variability on the overall inventory, states may choose from a range of options for the degree of temporal disaggregation used when creating annual inventories for SIPs and regional conformity analyses. To determine how much temporal disaggregation is appropriate in a given area, states may choose to calculate simplified annual emission inventories using the different approaches (i.e., run MOBILE6.2 using representative annual and seasonal inputs) and compare the results. Through this exercise, states may find that the differences between these methodologies are insignificant and further emissions analyses can be performed using a less detailed process. The interagency consultation process should be used to determine which approach is most appropriate for a given $PM_{2.5}$ nonattainment or maintenance area. This process should include consultation among state and local transportation and air quality agencies, as well as EPA and the U.S. Department of Transportation. Whichever approach is chosen, that approach should be used consistently throughout the analysis for a given pollutant or precursor. For example, if the 2002 base year annual inventory used in the attainment SIP is based on an analysis using input assumptions broken down for four seasons, the attainment year inventory used in that SIP should also be based on input assumptions for four seasons.

The following are some examples of methodologies that could be used. Other approaches may also be appropriate as determined through the interagency consultation process.

Developing Annual Inventories and Regional Conformity Analyses Using Annual Average MOBILE6.2 Inputs and a Single Set of MOBILE6.2 Runs

Single-Run Approach: This methodology would involve a single set of modeling runs with MOBILE6.2 for each year or scenario using only annual average inputs for all MOBILE6.2 input parameters and for VMT. EPA believes that in some areas this methodology may be appropriate because some input conditions may not vary significantly by time of year in a particular area. For example, distribution of VMT by vehicle class may be fairly constant in most areas. In addition, some input conditions may vary without affecting the emissions estimates for some pollutants generated by MOBILE6.2. For example, direct $PM_{2.5}$ emissions in MOBILE6.2 are insensitive to differences in ambient temperature and humidity (these cases are described in more detail in Question 10).

States should determine which input conditions do not vary significantly during the year. For these conditions, annual average input values may suffice. If local conditions are such that there is no significant variation in emissions derived from MOBILE6.2 based on time of year, state and local air quality and transportation agencies, in consultation with EPA and DOT, may choose to base annual SIP inventories and regional conformity analyses on MOBILE6.2 runs based on a single set of inputs and using total annual VMT. For this approach, the evaluation month in MOBILE6.2 should be July of the calendar year being evaluated.

Developing Annual Inventories and Regional Analyses Using Seasonal or Monthly Average MOBILE6.2 Inputs and Two or More Sets of MOBILE6.2 Runs

In some cases, variations in input conditions at different times of the year may result in significant differences in MOBILE6.2 emission factors. In some areas, there may also be significant differences in VMT at different times of the year. In these areas, developing inventories based on seasonal average input conditions may be necessary. Depending on the temporal variability of input data for a given area, from two to twelve sets of modeling runs with MOBILE6.2 may be used for each year or scenario. Some possible approaches are included below, but this does not include a comprehensive list of options. State and local air quality and transportation agencies, in consultation with EPA and DOT, should choose the approach that best suits local conditions.

Two-Season Approach: This approach uses winter and summer input conditions to develop inventories based on two sets of MOBILE6.2 runs. This approach assumes that each set of input conditions can be used to model six months of the year. The "winter" inventory would be based on average input conditions for the coldest months of the year

and the "summer" inventory would be based on average input conditions for the hottest months of the year. Annual VMT would be apportioned as appropriate to the winter or summer runs. If VMT does not vary significantly by season, half of the annual VMT could be apportioned to each of the two sets of MOBILE6.2 runs to create winter and summer inventories. If VMT is significantly different between the "winter" and "summer" seasons, then the VMT should be apportioned based on those differences.

Under this approach, the total annual inventory for an area would be the sum of the "winter" and "summer" inventories. For this approach, January should be used as the input for evaluation month in MOBILE6.2 for the "winter" inventory and July should be used for the "summer" inventory. Because the evaluation month input in MOBILE6.2 can also affect fuel parameters, MOBILE6.2 users should take care to ensure that model inputs for fuel parameters are set to properly represent the season modeled.

Four-Season Approach: This approach bases the total annual inventory on four sets of seasonal input conditions and four sets of MOBILE6.2 runs: winter, spring, summer, and fall. This approach assumes that four sets of inputs are used, one for each of the four seasons. VMT would be apportioned appropriately for each of these seasonal periods. If VMT does not vary significantly by season, one quarter of the annual VMT would be apportioned to each of the seasonal inventories. If VMT is significantly different between the seasons, then the VMT should be apportioned based on those differences.

The total annual inventory for an area would be the sum of the four seasonal inventories. MOBILE6.2 only has two input options for evaluation month (January and July). January should be used as the input for evaluation month in MOBILE6.2 for the winter inventory and July should be used for the summer inventory. For the spring inventory, July should be used as the input for evaluation month in MOBILE6.2, while January of the following year should be used as the input for the fall inventory. Because the evaluation month input in MOBILE6.2 can also affect fuel parameters, MOBILE6.2 users should take care to ensure that model inputs for fuel parameters are set to properly represent the season modeled.

Monthly Approach: Another available approach for developing annual inventories and regional conformity analyses would involve twelve sets of MOBILE6.2 modeling runs using monthly average input conditions and VMT. As a result, this methodology is more resource intensive than the previous approaches. States should note that this is the approach that is used to create the 2002 National Emission Inventory (NEI) that some areas may use as their 2002 base year inventory for SIP purposes. For detailed guidance on how to set the evaluation month in MOBILE6.2 to prepare monthly inventories for

calculation of annual inventories, see Section 2.2 of EPA's "Technical Guidance on the Use of MOBILE6.2 for Emission Inventory Preparation"[4].

States that wish to use this approach may also want to consider using the NMIM model to reduce the amount of data processing needed. See Question 13 below for more information on the use of NMIM in developing annual inventories and regional emissions analyses.

8. Q. How do emission factors for direct $PM_{2.5}$ and for $PM_{2.5}$ precursors vary with changes in external commands?

A. MOBILE6.2 uses different algorithms to estimate emissions from different pollutants. Inputs that contribute to seasonal variability in emissions for some pollutants may not result in variability for others. As a result, state and local agencies may be able to use simpler approaches for some pollutants than for others.

Direct $PM_{2.5}$, SOx, and Ammonia

MOBILE6.2 uses simple algorithms to estimate direct $PM_{2.5}$ emissions and SOx, and ammonia precursor emissions. In general, emissions of these pollutants and precursors do not vary, or vary only by small amounts, for most of the input conditions in MOBILE6.2, including key commands such as temperature, humidity, vehicle speed, and roadway type.

However, emission factors for direct $PM_{2.5}$ emissions and SOx and ammonia precursor emissions are affected by the following MOBILE6.2 input options:

- Registration (age) distribution
- Diesel sales fractions
- Annual mileage accumulation rates
- Distribution of VMT by vehicle class
- Input options that affect gasoline and diesel fuel sulfur content

Of these input options, registration distribution, diesel sales fractions, and annual mileage accumulation rates should not change based on time of year. If the remaining parameters do not vary significantly by time of year, a single set of MOBILE6.2 runs, using July as the evaluation month, may be sufficient to develop annual inventories for SIPs and regional conformity analyses for direct $PM_{2.5}$, SOx, and ammonia.

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[4]"Technical Guidance on the Use of MOBILE6.2 for Emission Inventory Preparation", Office of Transportation and Air Quality, US EPA, August 2004, EPA420-R-04-013, which can be found at www.epa.gov/otaq/m6.htm.

NOx and VOC

MOBILE6.2 emissions estimates of NOx and VOC precursor emissions are affected by temperature and humidity, fleet characteristics (e.g., age distribution of fleet, distribution of VMT by vehicle class), activity measures (e.g., speed distributions, distribution of VMT by roadway type), and fuel characteristics (e.g., gasoline RVP, sulfur content). When evaluating which approach to use for generating annual inventories for NOx and VOC, states should first consider which of the input conditions actually vary significantly based on time of year. States can then test whether those variations are likely to result in significant differences in emissions throughout different times of the year, as appropriate.

Based on an analysis of various parameters, states may conclude that simpler methods (i.e., the annual or seasonal methods) can be used to develop direct $PM_{2.5}$ inventories than are needed for $PM_{2.5}$ precursors such as NOx and VOC. The interagency consultation process should be used to determine if the use of different approaches for direct $PM_{2.5}$ and for $PM_{2.5}$ precursors would ease the resource burden of developing SIPs and conformity analyses while maintaining credible results.

9. Q. What other requirements apply when calculating regional emissions for transportation conformity?

A. Section 93.122 of the transportation conformity rule contains requirements for estimating VMT and inclusion of control measures in regional conformity analyses. Section 93.122(b) of the transportation conformity rule requires that serious, severe and extreme ozone nonattainment areas and serious CO nonattainment areas use network based travel models to perform regional conformity analyses. There is no similar requirement to use network based travel models for $PM_{2.5}$ nonattainment areas. However, $PM_{2.5}$ areas that are currently using network based travel models must continue to use them when calculating annual emission inventories, per Section 93.122(d). Areas without a network based travel model may use other appropriate methods for estimating VMT consistent with best professional practice and Section 93.122(d) of the conformity regulation. In addition, sections 93.110 and 93.111 require the latest planning assumptions and emission models to be used in all conformity analyses.

10. Q. For areas currently using network based travel models, does travel demand modeling need to be done for each season or month?

A. In some areas, variations in VMT or other vehicle activity inputs over the course of the year may not have a significant effect on MOBILE6.2 emissions estimates for direct $PM_{2.5}$ or $PM_{2.5}$ precursors. In such cases, a single travel demand modeling run would be sufficient to generate an annual VMT estimate or any other activity inputs derived from

the travel model. Annual VMT estimates would then be divided appropriately according to the level of temporal disaggregation used for the emissions estimation as described in Question 7.

State and local air quality and transportation agencies, in consultation with EPA and DOT, should determine whether significant seasonal variations in the output of network based travel models is expected and whether these variations would have a significant impact on $PM_{2.5}$ emissions estimates. The interagency consultation process should be used to determine the most appropriate method for estimating VMT and identifying the appropriate source for existing VMT data.

11. Q. Prior to the development of the $PM_{2.5}$ SIP, can simpler methods be used for regional conformity analyses?

A. Yes. EPA expects that the most thorough analysis to determine the appropriate methods to be used for developing annual inventories will occur during the development of the SIP, taking into account the needs and capabilities of air quality modeling tools and the limitations of available data. Prior to the development of the SIP, state and local air quality and transportation agencies may not have all of the information they need to determine how much temporal disaggregation is necessary to adequately account for variation in emissions during the year. State and local agencies may also need additional time to collect data on a seasonal or monthly basis if that data is needed. For these reasons, state and local air quality and transportation agencies may, through the interagency consultation process, decide to use simplified methods for regional conformity analyses done prior to an adequate or approved SIP budget. For example, through the interagency consultation process, state and local agencies may choose to base regional conformity analyses used in interim conformity tests (build-no-greater-than-no-build or no-greater-than-2002 tests) on average annual inputs and a single set of MOBILE6.2 runs even while they are working on developing an RFP, attainment, or maintenance SIP using a more complicated approach.

Whatever approach is selected, the latest planning assumptions, latest emissions model, and appropriate methods for estimating travel and speeds must be used as required by Sections 93.110, 93.111, and 93.122 of the conformity rule. Also, the approach that is selected for the interim emissions tests should be used consistently when completing a conformity test. Whether a submitted or draft 2002 SIP inventory or some other inventory determined through the interagency consultation process is used, the regional conformity analysis for the baseline year test should be based on the same approach that was used to develop the baseline inventory for conformity purposes. For example, if the two-season approach is used to develop the 2002 baseline year for conformity purposes, the same two-season approach should be used for the regional conformity analysis. See the preamble of the July 1, 2004 conformity rule (FR 40015 left column) for more

information on considerations for the 2002 baseline test. Similarly, the same approach should be used to develop the build and no-build scenarios under the build-no-greater-than-no-build test.

12. Q. Once the SIP budget is developed, should the same methods be used for regional conformity analyses?

A. Yes. Regional conformity analyses should be based on the same approach used to develop the direct $PM_{2.5}$ and any $PM_{2.5}$ precursor budgets established in the applicable SIP. For example, if the NOx SIP budget was determined using average seasonal inputs in MOBILE6.2 for winter, spring, summer, and fall, the same approach should be used for regional conformity analyses based on that budget. State and local air quality and transportation agencies should use the interagency consultation process while developing the approach used for the SIP budgets to consider the impact this will have on data collection, modeling, and analysis needs for future regional conformity analyses.

13. Q. What is the National Mobile Inventory Model (NMIM) and how can it be used to determine annual emissions inventories?

A. NMIM is a graphical user interface that contains the MOBILE6.2 and NONROAD[5] models and a database of county-level input information, the National County Database (NCD). NMIM produces monthly inventories by source classification code (SCC) and county. When using NMIM, users can simply select the year, months, and county or counties they wish to evaluate. Since NMIM includes county-level information, it will automatically write MOBILE6.2 input files, run MOBILE6.2 and multiply the emission factors by VMT to produce emission inventories for each county for each month.[6] NMIM also provides a post-processing module that will aggregate the months into an annual inventory and produce tab-delineated ASCII output that can be read into database or spreadsheet software applications.

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[5]Because it incorporates MOBILE6.2 and NONROAD, NMIM can be used to generate emissions inventories for both on-road motor vehicles (cars, trucks, buses, and motorcycles) and off-road equipment (agricultural and construction equipment, lawn and garden equipment, and off-road recreational vehicles among others) for SIP purposes. Because transportation conformity applies only to on-road motor vehicles, only the on-road portion of an inventory generated using NMIM would be used to generate SIP budgets and regional conformity analyses.

[6] "EPA's National Mobile Inventory Model (NMIM), A Consolidated Emissions Modeling System for MOBILE6 and NONROAD". H. Michaels, et al. U.S. EPA. www.epa.gov/otaq/models/nmim/420r05003.pdf.

NMIM is not considered a new model and does not start a new conformity grace period pursuant to 40 CFR 93.111. Because NMIM incorporates MOBILE6.2, it may be used to generate emissions inventories for SIPs and regional conformity analyses. NMIM may provide an easier way for states to develop annual inventories because it is designed to create annual inventories based on monthly inputs. However, before using NMIM, state and local air quality and transportation agencies should work together with EPA and DOT to determine whether NMIM is appropriate given local conditions and modeling methods and to determine what modifications, if any, are needed to the NMIM database to accurately model current local conditions.

The use of NMIM is not required for SIPs or regional conformity analyses. Some areas may choose not to use NMIM simply because it does not provide a significant resource advantage compared to pre- and post-processing methods already being used. State and local agencies should carefully review the NMIM documentation before deciding whether to use it. NMIM has some limitations in some applications and, as a result, the use of NMIM may not be appropriate in all areas. For example, some areas may already be using more sophisticated methods for pre- and post-processing input and emissions data than NMIM can accommodate. In that case, state and local agencies should not use NMIM.

States have provided information for the NCD as part of the National Emissions Inventory (NEI) development process. However, given the NEI cycle, this may not be the most recent or best available information at the time a state initiates modeling as required in the latest planning assumptions provisions of the conformity rules (40 CFR 93.110). For SIPs and regional conformity analyses, state and local agencies should review the information in the NCD to verify that it is still accurate and up-to-date. Where more current information is available, the database must be modified to incorporate the most recent data to meet latest planning assumptions requirements for SIPs and conformity. (EPA encourages states to separately submit updates to the NCD so that the most accurate database is available for both national and local inventory development). The NCD works at the county level and will need to be modified to account for areas containing partial counties, if necessary. The interagency consultation process should be used to evaluate whether the use of NMIM is appropriate in a given area, and to evaluate what changes are needed in the NMIM database.

State and local agencies should take special care to ensure that VMT data used in NMIM is derived appropriately. Areas required to use VMT data from travel demand models need to make sure that the appropriate VMT estimates are incorporated into the NCD. One limitation of the NCD is that it includes VMT data for only select years but not necessarily for the years that need to be evaluated for SIP or transportation conformity purposes. Therefore, even if the VMT data in the NCD are correct for a specific year, areas wishing to use NMIM may need to calculate and enter the necessary VMT inputs for other years into the NCD. Areas should also evaluate the speed assumptions in the NCD and revise them as needed to reflect current local estimates.

The current version of NMIM is available at www.epa.gov/otaq/nmim.htm . EPA is currently working on updates to the NONROAD portion of NMIM and to the NCD and expects to release a revised version of NMIM later in 2005, which will be posted on the website and notice sent out through our list-server.

14. Q. Who can I contact if I have further questions about developing annual $PM_{2.5}$ SIP emissions inventories and budgets, and regional conformity analyses?

A. For specific questions about a particular nonattainment or maintenance area, please contact the SIP or transportation conformity staff person responsible for your state at the appropriate EPA regional office. A listing of regional offices, the states they cover, and contact information for EPA regional conformity staff can be found at the following website: www.epa.gov/otaq/transp/conform/contacts.htm.

General questions about this guidance can be directed to Gary Dolce at EPA's Office of Transportation and Air Quality, dolce.gary@epa.gov or 734-214-4414.

MEMO

TO: Transportation Conformity Working Group

FROM: Ted Harris, Air Quality Program Manager, 213-236-1916, harrist@scag.ca.gov

DATE: September 23, 2005

SUBJECT: Fine Particle ($PM_{2.5}$) Conformity Determination Process

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SUMMARY:
This memo outlines a proposed process to make a conformity determination for the new fine particle ($PM_{2.5}$) standard. The new federal conformity regulation for fine particulate matter ($PM_{2.5}$) requires the Southern California Association of Governments (SCAG) to receive approval from the United States Department of Transportation (US DOT) on SCAG's conformity determination on the 2004 Regional Transportation Plan (RTP) and the 2004 Regional Transportation Improvement Program (RTIP) by April 5, 2006 or the region risks a conformity lapse.

BACKGROUND:

Transportation conformity for the $PM_{2.5}$ air quality standard will apply in new nonattainment areas on April 5, 2006 – that is, one year after the effective date of their designation. EPA's designations for the new $PM_{2.5}$ standard were effective April 5, 2005, at which point a one-year conformity grace period began.

The final $PM_{2.5}$ rule requires $PM_{2.5}$ nonattainment areas to consider direct $PM_{2.5}$ emissions and significant precursor emissions. The final federal $PM_{2.5}$ rule adds $PM_{2.5}$ precursors, such as nitrogen oxides (NOx), to the transportation conformity regulations because these gases react and cool to form fine particles. Prior to the submission of the proposed $PM_{2.5}$ State Implementation Plan (SIP/Air Quality Management Plan), direct $PM_{2.5}$ emissions and NOx emissions must be considered in $PM_{2.5}$ conformity determinations. Additional $PM_{2.5}$ precursors could be included if determined by interagency consultation. Additional $PM_{2.5}$ precursors may be required for conformity determinations after a $PM_{2.5}$ State Implementation Plan has been submitted to US EPA, if additional $PM_{2.5}$ precursors are determined to be important contributors to $PM_{2.5}$ problems in the South Coast Air Basin.

Key ($PM_{2.5}$) Requirements:
As stated above, nonattainment area designations for the new fine particle ($PM_{2.5}$) standard became effective on April 5, 2005, and an approved conformity determination is required by April 5, 2006, one year after the effective date.

The South Coast Air Basin is the only $PM_{2.5}$ non-attainment area in Southern California.

SCAG Region – Fine Particle ($PM_{2.5}$) Non-attainment Area

Non-attainment Area	Maximum Attainment Date
South Coast Air Basin (SCAB)	2010 with a possible 5 year extension to **2015**

Proposed Process for fine particle conformity determination on the 2004 RTP and RTIP:

1. Conduct ongoing public participation and interagency consultation throughout the process.
2. Perform regional emission analysis. For this $PM_{2.5}$ conformity determination, SCAG expects the regional emissions analysis to include direct $PM_{2.5}$ emissions and NOx as a $PM_{2.5}$ precursor. Since no emissions budgets exist for the new $PM_{2.5}$ standard, the interim emissions test is required. The interim emissions test requires SCAG to demonstrate that implementation of the 2004 RTP and the 2004 RTIP will not cause $PM_{2.5}$ emissions to exceed emissions in the year 2002 or *no-build* emissions for appropriate future years. The proposed modeling years are 2002 or 2010, 2020, and 2030.
3. Reaffirm the existing conformity findings for the 2004 RTP and 2004 RTIP.
4. Release the draft conformity analyses and documentation for the new $PM_{2.5}$ standard in November 2005 for a 30-day comment period.
5. Hold a public hearing in December 2005.
6. Adopt the resolution making the final Conformity Determination in February 2006.
7. Send SCAG's Conformity Determination to the federal agencies for approval.
8. Approval by federal agencies by April 5, 2006.